



**CITY OF VALLEJO**

**HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION**

**Analysis of Impediments to Fair Housing Choice**

April, 2011

# Analysis of Impediments to Fair Housing Choice

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# CITY OF VALLEJO

## Analysis of Impediments to Fair Housing Choice April, 2011

### I. Introduction and Executive Summary

As a condition of the City of Vallejo continuing to receive HOME and CDBG Program funding the Department of Housing and Urban Development (HUD) requires submission of its Consolidated Plan that is updated every five years. The Consolidated Plan analyzes Vallejo's housing market conditions, assesses the housing needs of lower income families and other groups within eligible populations, describes a strategy for addressing the identified needs, and identifies an action plan for investing federal affordable housing dollars. Part of the Plan which is subject to HUD approval requires the City to affirmatively further fair housing through the development of an Analysis of Impediments. The goal of the Analysis of Impediments (AI) is to analyze the City of Vallejo's policies and practices that can negatively affect the promotion of fair housing and the ability of Vallejo residents to secure housing opportunities of their choice.

The passage of Title VIII of the Civil Rights Act of 1968, also known as the Federal Fair Housing Act, made it illegal to discriminate on the basis of an individual's race, color, national origin, religion, or sex; the 1988 Fair Housing Amendments Act added protections for families with children, known as familial status, and disabled persons in the sale or lease of residential property. It also prohibits discrimination in advertising, lending, brokerage, and other services in residential transactions.

The State of California, recognizing that discrimination generally extends beyond the Federally defined protected classes, increased the coverage of fair housing protection in the State by creating codes that include additional protected classes. The California Fair Employment and Housing Act (FEHA) and the Unruh Act, the primary fair housing laws of California, added protection to the following classes: ancestry, marital status, sexual orientation, source of income, age, and arbitrary discrimination<sup>1</sup>.

HUD defines the AI as "the review of impediments to fair housing choice in the public and private sector." The AI includes: a review of local jurisdictional laws, regulations, and administrative policies, procedures, and practices; an assessment of how those laws affect the location, availability, and accessibility of housing; an assessment of conditions, both public and private, affecting fair housing choice for all protected classes; an assessment of the availability of affordable, accessible housing in a range

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<sup>1</sup> Fair Housing: It's the Law (PMR107) Property Management Series California Apartment Association (CCRM)

of unit sizes; an analysis of any actions, omissions, or decisions taken or which have the effect of restricting housing choices because of race, color, religion, sex, disability, familial status, national origin, ancestry, marital status, sexual orientation, source of income, age, and arbitrary discrimination which restrict housing choices or the availability of housing choice.

- A. **Who Conducted the Analysis:** Participants that contributed to the development of the Analysis of Impediments to Fair Housing include: Elected City officials, Vallejo Housing Authority (VHA) Housing Choice Voucher (HCV) Participants, Housing Authority staff, Legal Services of Northern California, local community-based organizations, private lending institutions, appraisers, and City staff.
- B. **Methodology Used:** A survey questionnaire was used to garner Vallejo stakeholders and residents' thoughts regarding whether they specifically or organizationally were aware of or had experienced housing discrimination, and their thoughts regarding the availability and/or quality of affordable housing opportunities in Vallejo.
- C. **Funding:** The survey was funded with Housing Authority and CDBG Program funding.
- D. **Conclusions:** Based on the results of the City's Fair Housing Survey; the housing needs analysis completed for the development of both the Draft City of Vallejo 2009–2014 Housing Element Update, and the 2010–2015 City of Vallejo Consolidated Plan; results of Fair Housing of Marin's 2009 Solano County Racial Discrimination in Email Responses to Online Housing Ads Audit Report; and information provided by fair housing organizations regarding racial discrimination complaints alleged by their clients, it is the conclusion of this Analysis that the two main barriers to ensuring fair housing and the furthering of housing choice in Vallejo are Not-in-My-Back-Yard (NIMBY) attitudes, and a lack of available affordable housing units. The consequence of NIMBY attitudes towards the development of affordable rental housing, (which are usually based on unproven stereotypes and/or myths), is that they can influence local housing policies that can impede the City's ability to meet its housing production needs, which are based on population growth and household incomes. Additionally, based on the 2000 Census, minority populations in Vallejo tend to have lower household incomes; thus, the inability to provide housing choices that reflect the diverse income levels of the City, due to the NIMBYism and lack of available affordable housing units referenced above, can be construed as a form of discrimination.

Other constraints to fair housing and the promotion of housing choice include: elements of the City's planning, zoning, and permitting approval process that appear somewhat arduous, costly, and excessively time intensive. The silver

lining to this discovery is that the Draft City of Vallejo 2009-2014 Housing Element Update has identified these same barriers and has proposed resolutions that will address them. Based on the City's Fair Housing Survey, the Fair Housing Audit Survey conducted by Fair Housing of Marin, information provided by Legal Services of Northern California (LSNC), and Housing Authority Resident Advisory Board (RAB) comments, it is the City's opinion that there is some indication that housing discrimination is still being perpetuated against Federal and State protected classes, and that there are impediment/barriers to promoting housing choice for protected classes.

Though there is evidence that barriers to the development of affordable housing exist in Vallejo, the City is pleased to note that it continues to make progress in overcoming and/or removing those identified barriers to the promotion of housing choice through the implementation of its various housing programs that target low and moderate income households.

## II. Jurisdictional Background Data

### A. Demographic Data

#### 1. Population and Racial/Ethnic/Geographic Characteristics

The City of Vallejo, as of 2009, was the 9th largest city in the San Francisco Bay Area, and 48th in the State of California by population.<sup>2</sup> According to 2000 Census data, Vallejo consists of approximately 116,760 people, with no one ethnic group representing over 50 percent of the population, making Vallejo one of the most diverse communities in the Bay Area.

Between 2000 and 2008, Vallejo's ethnic populations were considerably diverse and with a relatively even distribution between white, African American, Asian/Pacific Islander, and Hispanic<sup>3</sup>. Because of its diverse population, Vallejo has several areas with significant minority populations that are not heavily low- or moderate-income. The City of Vallejo defines "areas of minority concentration" as any U.S. Census Bureau Block Group with a minority population that is over 70 percent. The City has identified those Block Groups with **minority concentrations that are greater than 70 percent, and that also have a majority of residents that are of low- or moderate-income.**

The areas that meet both of these criteria in Vallejo are: the Florida-Hilton neighborhood in East Vallejo (Census Tract 2503, Block Group 2, which is 65.2 percent low- and moderate-income); two Block Groups in South Vallejo (Census Tract 2507.01, Block Group 2, which is 71.1 percent low- and moderate-income; and Census Tract 2507.02, Block Group 2, which is 53.9

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<sup>2</sup> 2000 Census Data; Wikipedia

<sup>3</sup> Draft City of Vallejo 2009-2014 Housing Element Update

percent low- and moderate-income); one Block Group in Vallejo Heights (Census Tract 2517.02, Block Group 2, which is 69 percent low- and moderate-income); one Block Group in California Meadows, in North Vallejo (Census Tract 2518.03, Block Group 3, which is 51.2 percent low- and moderate-income); Census Tract 2519.01, Block Group 3, also in North Vallejo, which is 51.7 percent low- and moderate-income (and bounded by Hogan Avenue, Sereno Drive, Parkview Terrace, and Tuolumne Street); and Census Tract 2519.02, Block Group 2, which is near the Country Club Crest in North Vallejo, is also known as College Park, and has a low- and moderate-income population of 57.6 percent.<sup>4</sup>

**Table 1. Ethnic Population of Vallejo Residents, 2000-2008**

| Ethnicity                      | 2000           |             | 2008           |             |
|--------------------------------|----------------|-------------|----------------|-------------|
|                                | Number         | % of Total  | Number         | % of Total  |
| White                          | 35,533         | 31%         | 27,646         | 23%         |
| Black/African American         | 26,592         | 23%         | 26,592         | 22%         |
| American Indian/Alaskan Native | 710            | >1%         | 550            | >1%         |
| Asian/ Pacific Islander        | 28,712         | 25%         | 30,742         | 26%         |
| Hispanic Origin                | 18,292         | 16%         | 25,479         | 22%         |
| Other Race                     | 275            | >1%         | 320            | >1%         |
| Two or More Races              | 6,237          | 5%          | 5,764          | 5%          |
| <b>Total</b>                   | <b>116,351</b> | <b>100%</b> | <b>118,325</b> | <b>100%</b> |

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In the City the age of the population was spread, with 27.6 percent under the age of eighteen, 9.0 percent from eighteen to 24, 29.6 percent from 25 to 44, 22.6 percent from 45 to 64, and 11.2 percent who were 65 years of age or

<sup>4</sup> City of Vallejo 2010–2015 Consolidated Plan

<sup>5</sup> 2000 U.S. Census; Claritas, 2008



older. The median age was 35 years. For every 100 females there were 93.9 males. For every 100 females age 18 and over, there were 89.7 males. (See Tables 1 and 2.)

**Table 2. Population Composition by Age, 2000-2008**

| Age Distribution | 2000           | %           | 2008           | %           |
|------------------|----------------|-------------|----------------|-------------|
| Under 18         | 31,824         | 29%         | 30,324         | 26%         |
| 18 – 24          | 10,372         | 6%          | 11,018         | 9%          |
| 25 – 34          | 15,440         | 13%         | 15,851         | 13%         |
| 35 – 44          | 19,375         | 17%         | 16,388         | 14%         |
| 45 – 54          | 16,991         | 15%         | 17,202         | 16%         |
| 55 – 64          | 9,304          | 8%          | 13,266         | 10%         |
| 65 +             | 13,045         | 11%         | 14,276         | 12%         |
| <b>Total</b>     | <b>116,351</b> | <b>100%</b> | <b>118,325</b> | <b>100%</b> |

## **2. Household Characteristics**

The 2000 Census divides households into two different categories, depending on their composition. Family households consist of two or more related persons living together. Non-family households include persons who live alone or in groups of unrelated individuals. As shown in Table 3, 72 percent of Vallejo households were family households in 2000. By 2008, the percentage of family households declined by one percent.

The 2000 Census also reports that there were 39,601 households, of which 36.5 percent had children under the age of eighteen living with them, 49.1 percent were married couples living together, 16.5 percent were female head of household, 28.7 percent were non-families, 22.7 percent of all households were made up of individuals, and eight percent had someone living alone who was 65 years of age or older. The average household size was 2.90 and the average family size was 3.43.

**Table 3. Household Types**

| Household Type | 2000          | 2000        | 2008          | 2008        |
|----------------|---------------|-------------|---------------|-------------|
|                | Number        | Percentage  | Number        | Percentage  |
| Families       | 28,438        | 72%         | 28,434        | 71%         |
| Non-Families   | 11,154        | 28%         | 11,641        | 29%         |
| <b>Total</b>   | <b>39,592</b> | <b>100%</b> | <b>40,075</b> | <b>100%</b> |

2000 Census; Claritas, 2008

### 3. Income Characteristics

The 2008 median household income in Vallejo was \$70,001, and the area median income (AMI) for a 4 person household was \$75,400. The distribution of 2008 household income in Vallejo is clustered between households earning between \$35,000 and \$99,000, which represents approximately 52 percent of all family households. Households earning more than \$99,999 represent 28 percent and those earning less than 35 percent represent approximately 20 percent of all family households. It is estimated that the City of Vallejo's extremely low-income population consists of 2,504 households. It is further estimated that of the 2,504 households, 1,624 households earn less than \$15,000 a year, and that approximately 880 of these households have incomes between \$15,000 and \$24,999<sup>6</sup>.

**Table 4. Solano County 2008 Income Limits**

| Income Category | % of AMI  | 2-Person Household  | 3-Person Household  | 4-Person Household  |
|-----------------|-----------|---------------------|---------------------|---------------------|
| Extremely Low   | 0 - 30%   | \$0 - \$18,100      | \$0 - \$20,350      | \$0 - \$22,600      |
| Very Low        | 31 - 50%  | \$18,101 - \$30,150 | \$20,351 - \$33,950 | \$22,601 - \$37,700 |
| Low             | 51 - 80%  | \$30,151 - \$48,250 | \$33,951 - \$67,900 | \$37,701 - \$75,400 |
| Moderate        | 81 - 120% | \$48,251 - \$72,400 | \$67,901 - \$81,500 | \$75,401 - \$90,500 |

Draft City of Vallejo 2009-2014 Housing Element Update; 2008 State Income Limits, California Department of Housing and Community Development

<sup>6</sup> Draft City of Vallejo 2009-2014 Housing Element Update

**Table 5. Vallejo Family Households by Household Income, 2008**

| Income Level      | Number of Households | Percentage of Total Households |
|-------------------|----------------------|--------------------------------|
| <\$15,000         | 1,624                | 6%                             |
| \$15,000–\$24,999 | 1,760                | 6%                             |
| \$25,000–\$34,999 | 2,379                | 8%                             |
| \$35,000–\$49,999 | 3,553                | 13%                            |
| \$50,000–\$74,999 | 6,133                | 22%                            |
| \$75,000–\$99,999 | 4,897                | 17%                            |
| >\$100,000        | 8,094                | 28%                            |
| <b>Total</b>      | <b>28,434</b>        | <b>100%</b>                    |

Claritas, 2008

#### **4. Areas of Low-Income Concentration**

The City of Vallejo based on 2000 Census data had no “area of low-income concentration”, which is defined as any Census Tract area in Vallejo that has a poverty level (i. e., the percentage of persons below the Federal poverty line) over 40 percent. More recent 2010 Census data indicates that Vallejo has one Census Tract that has a poverty level above 40 percent; Census Tract Area 25.0900 has a poverty rate of 45.09 percent (per the HUD Choice Neighborhoods website). According to the 2000 Census, 7.7 percent of families, and 10.1 percent of individuals, in Vallejo live below the poverty level. There are areas that have high percentages of low-income household concentration in Vallejo. They are: the Florida-Hilton neighborhood in East Vallejo (Census Tract 2503, Block Group 2, which is 65.2 percent low- and moderate-income); two Block Groups in South Vallejo (Census Tract 2507.01, Block Group 2, which is 71.1 percent low- and moderate-income; and Census Tract 2507.02, Block Group 2, which is 53.9 percent low- and moderate-income); one Block Group in Vallejo Heights (Census Tract 2517.02, Block Group 2, which is 69 percent low- and moderate-income); one Block Group in California Meadows, in North Vallejo (Census Tract 2518.03, Block Group 3, which is 51.2 percent low- and moderate-income); Census Tract 2519.01, Block Group 3, also in North Vallejo, which is 51.7 percent low- and moderate-income (and bounded by Hogan Avenue, Sereno Drive, Parkview Terrace, and Tuolumne Street); and Census Tract 2519.02, Block Group 2, which is near the Country Club Crest in North Vallejo, is also known as College Park, and has a low- and moderate-income population of 57.6 percent.

**Table 6. Poverty Percentage by Race/Ethnicity Below the Poverty Level**

| Poverty Rate by Race/Ethnicity | Metro Area |
|--------------------------------|------------|
| Black                          | 14.0%      |
| American Indian                | 14.0%      |
| Hispanic                       | 11.0%      |
| Non-Hispanic White             | 6.0%       |
| Asian/Pacific Islander         | 7.0%       |

## **5. Employment and Transportation**

The 2000 Census reports that 61 percent of Vallejo residents age sixteen and older were gainfully employed, and approximately 39 percent were not in the work force. The total number of Vallejo jobs increased from 32,480 in 2000 to 35,720 in 2005, constituting an increase of 3,240 jobs. The increased employment was attributed to primary occupations that included: 26.9 percent in professional management positions, 19.6 percent in service related fields, 26.5 percent in sales and office occupations, 12.8 percent in the construction and/or maintenance field, and 13.6 percent in production, transportation, and material moving occupations.

Forecast projections of such groups as the Association of Bay Area Governments (ABAG) estimate that Vallejo can expect continued job growth of 1.5 percent annually for the next ten year period, 2005 –2015. It is also anticipated that Vallejo will see an increase of over 5,000 jobs over the ten year period. However, with the recession of 2008, the employment expectations and trends may be significantly impeded in the City of Vallejo.

In the past the City of Vallejo has experienced considerable fluctuation in its job trends. From 1994–1996, the City's economic base took a huge hit due to the closure of Mare Island Naval Shipyard. At that time, it was estimated that Vallejo lost over 9,500 military and civilian workers. However, the recession of 2008 that has continued through 2010 and 2011 has forced Vallejo, as well as other cities, to reevaluate their expectations of growth. These changes may be short term; however, they are important to note. According to the State of California Employment Development Department, the unemployment rate for Vallejo, as of November 2010, was thirteen percent. The unemployment rate

<sup>7</sup> Diversity Data-Metropolitan Quality of Life Data/ 2000 Census Summary File 3 Vallejo/Fairfield

for the State of California is 12.4 percent. The unexpectedly high unemployment numbers contradict the previously anticipated employment growth of 1.5 percent annually. Professions that have experienced significant cuts include: construction, manufacturing, professional and business services, and leisure and hospitality.

Transportation is a good indicator of community growth and overall health; thus, the City of Vallejo and the City of Benicia are merging its transportation system as a cost saving tool. Jointly they will oversee the four transit services of Vallejo: Vallejo Transit (bus); Vallejo Baylink (ferry); Vallejo/Benicia RunAbout (disabled transportation); and the Taxicab Scrip program. These transit service goals are to provide quality transportation that is reliable for transit dependent riders within the developed areas of Vallejo. Emphases are on services to schools, health care centers and facilities, public service centers, and shopping areas. The availability of ferry boat service facilitates commuting to San Francisco and Oakland, two major employment hubs, which provide an alternative to commuting via the automobile.

The Vallejo/Benicia RunAbout, a valuable transit service, provides curb-to-curb transportation to eligible disabled people of all ages in the Vallejo area, as required by the Americans with Disabilities Act of 1991 (ADA). RunAbout operates sixteen passenger vans which are able to carry up to four wheelchairs at a time. Runabout is a "shared ride" service that arrives at a passenger's door within fifteen minutes of the time it is requested.

The Taxicab Scrip Program offers a discounted alternative to public transportation for residents that are 65 years or older or who have a disability as defined by the Regional Transit Discount Card Program.

**Table 7. Employment Trends**

|                                      | 2000<br>Vallejo | 2005<br>Vallejo | Annual<br>Growth<br>Rate<br>2000-05 | 2000<br>Solano<br>County | 2005<br>Solano<br>County | Annual<br>Growth<br>Rate<br>2000-05 | 2000<br>Bay Area | 2005<br>Bay Area | Annual<br>Growth<br>Rate<br>2000-05 |
|--------------------------------------|-----------------|-----------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|------------------|------------------|-------------------------------------|
| Employed Residents                   | 54,380          | 55,520          | 0.4%                                | 182,964                  | 194,900                  | 1.3%                                | 3,452,117        | 3,225,100        | -1.3%                               |
| Agricultural and Mining              | 370             | 340             | -1.6%                               | 2,060                    | 2,010                    | -0.5%                               | 24,470           | 24,170           | -0.2%                               |
| Manufacturing Jobs                   | 3,040           | 3,090           | 0.3%                                | 22,040                   | 22,630                   | 0.5%                                | 863,420          | 709,380          | -3.7%                               |
| Retail Jobs                          | 4,120           | 4,400           | 1.4%                                | 17,600                   | 19,050                   | 1.6%                                | 402,670          | 367,680          | -1.7%                               |
| Financial and Professional Svc       | 4,160           | 4,830           | 3.3%                                | 18,350                   | 21,510                   | 3.4%                                | 851,610          | 780,160          | -1.7%                               |
| Health Education and Rec Scvs        | 16,130          | 18,050          | 2.4%                                | 47,010                   | 53,080                   | 2.6%                                | 1,056,030        | 1,055,010        | -0.02%                              |
| Other Jobs                           | 4,660           | 5,010           | 1.5%                                | 29,680                   | 32,240                   | 1.7%                                | 555,260          | 513,240          | -1.5%                               |
| Total Jobs                           | 32,480          | 35,720          | 2.0                                 | 136,740                  | 150,520                  | 2.0%                                | 3,753,460        | 3,449,640        | -1.6%                               |
| Ratio Jobs/<br>Employed<br>Residents | 0.60            | 0.64            |                                     | 0.75                     | 0.77                     |                                     | 1.09             | 1.07             |                                     |

Draft City of Vallejo 2009-2014 Housing Element Update; ABAG Projections, 2007

## **B. Housing Market Profile**

### **1. Housing Supply**

There were a total of 41,219 housing units in Vallejo in 2000, with a homeownership rate of 63.2 percent, and renters making up 37 percent of the housing market. According to the City's Draft 2009-2014 Housing Element Update, there are certain racial/ethnic groups in Vallejo who have disproportionately greater housing needs than the population as a whole, in the following categories: renter households at 0-30 percent of the area median income; small and large related owner households at 0-30 percent of the area median income; elderly and other rental households at 31-50 percent of the area median income; elderly, small related, large related, and all other owner households at 31-50 percent of the area median income; and renter and owner households in all categories at 51-80 percent of the area median income<sup>8</sup>.

<sup>8</sup> 2010 – 2015 Consolidated Plan

Nearly half of the occupied renter households at 0-50 percent of the area median income are experiencing some housing problem. For example, the rent persons in this income group can afford to pay is fifteen to 47 percent below the applicable fair market rent in Vallejo, depending on bedroom size.

In addition, there are 1,950 renter and owner housing units in Vallejo in need of rehabilitation, i. e., considered substandard. All of these units are suitable for rehabilitation. According to the Draft City of Vallejo 2009-2014 Housing Element Update, 46 percent of the housing units in Vallejo were constructed before 1970. Even with normal maintenance, dwellings over 40 years of age can deteriorate, necessitating significant rehabilitation.

The analysis of housing needs also indicate there is a need for additional affordable rental housing for very low-income families; the rehabilitation of rental housing for very low-income families; rental assistance for very low-income renters. (i. e., grants for first and/or second month's rent, and/or security deposits; and accessibility improvement grants for the disabled who are in need of home improvements to allow for aging in place).

According to the Draft City of Vallejo 2009-2014 Housing Element Update Needs Assessment, with projected population growth for seniors, it is anticipated that more affordable housing targeting the elderly will be required. Approximately 26 percent of Vallejo's elderly households are renters, and approximately seventeen percent are at less than 30 percent of the area median income, such that the need for affordable senior housing that promotes aging in place will be in demand.

## **2. Household Tenure and Vacancy**

It was projected that in 2008, 63 percent of occupied housing units would be owner occupied and the remaining units (37 percent) occupied by renters. According to the State Department of Finance, the 2008 vacancy rate in the City and the County was approximately four percent.<sup>9</sup>

## **3. Housing Costs**

In August 2007 the average sales price of a Vallejo single-family residence was \$588,760; as of January 2011 the average single-family sales price was \$159,200<sup>10</sup>. This drop in price clearly demonstrates the effects of the housing crisis on the Vallejo housing industry, and its continued impact. Affordability is

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<sup>9</sup> Draft City of Vallejo 2009-2014 Housing Element Update

<sup>10</sup> Zillow.com

based on the following assumptions: a household spending 30 percent or less of their total household income for shelter; the maximum household income levels established by the (HUD); and maximum affordable sales prices based on a ten percent down payment, on a 30-year fixed rate mortgage with a seven percent interest rate.

#### **4. Rental Housing**

Median rental prices in Vallejo range from \$975 to \$1,300 for a two- or three-bedroom apartment and \$1,200 to \$1,575 for the same size single-family home rental. The City estimates that there are two other target groups that are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered: 4,522 households at 0-30 percent of the AMI, and 4,948 households paying more than 50 percent of their income for housing. These groups are considered by the City to comprise the at-risk population.

#### **5. Home Ownership**

The economic and housing downturn affected housing prices in Vallejo in 2008. Prices declined on average from 2007 to 2008 by 58 percent.<sup>11</sup> Many families lost their homes to foreclosure, and home prices are now at levels not seen since the early 1990s in California. Given the low purchase prices, low- and moderate-income households may now be able to afford to buy homes at the reduced prices. It is important to note that though home prices are reduced, the home mortgage lender underwriting standards have become significantly more onerous. This increased and strenuous analysis of a borrower's credit worthiness will disproportionately affect people of color that have traditionally been underrepresented in their ability to secure conventional financing for the purchase of a home<sup>12</sup>.

#### **6. Overpayment**

A total of 37 percent of households overpaid for their housing in Vallejo. Forty-one percent of households that were renting were overpaying for housing, compared with 30 percent of homeowners.

### **III. Affordable Housing Needs**

The Consolidated Plan and the Draft City of Vallejo 2009-2014 Housing Element Update have identified four household income groups in need of quality affordable

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<sup>11</sup> Draft City of Vallejo 2009-2014 Housing Element Update

<sup>12</sup> Paying More for the American Dream IV: The Decline of Prime Mortgage Lending in Communities of Color, May 2010



rental housing in Vallejo. The income groups include: extremely low income ( $\leq 30$  percent AMI), (327 units); very low-income ( $\leq 50$  percent AMI), (328 units); low income ( $\leq 80$  percent AMI), (468 units); moderate income ( $\leq 120$  percent AMI), (568 units); and above moderate income (1,409 units). Additionally, the Draft City of Vallejo 2009-2014 Housing Element Update and the Consolidated Plan indicate the total number of very low-income renter households with a housing problem (i. e., having a housing cost burden greater than 30 percent of their income, and/or living in overcrowded housing (1.01 or more persons per room), and/or living in a unit without complete kitchen or plumbing facilities) is 4,416. The total number of very low-income renter households in Vallejo is 5,426. This means that more than 80 percent of the very low-income renter households in Vallejo are experiencing some housing problem.

These estimated housing need unit projections have been compiled by ABAG, which has estimated that approximately 3,100 units of housing are needed for Vallejo to meet its housing production needs.

To further bring attention to the unmet need for those at or below 50 percent of the AMI, the Vallejo Housing Authority currently administers over 2,200 Housing Choice Vouchers (HCV/Section 8), and twenty-one Project Based Vouchers in the City. As of January 2011 there were approximately 5,300 families on the Housing Authority's HCV waiting list. Of the 5,300 families on the waitlist approximately 3,700 are identified as being extremely-low income ( $\leq 30$  percent AMI).

The total number of very low- and low-income owner-occupied households with a housing problem is 4,686. This represents 63 percent of the total number of very low- and low-income owner-occupied households in Vallejo.

## **A. Affordable Special Needs Housing**

### **1. Large Family Housing**

According to the 2000 Census, approximately 24 percent (3,547 units) of renter-occupied units in Vallejo contained three or more bedrooms and only seven percent (1,052 units) of renter occupied units contained four or more bedrooms, including renter-occupied single-family dwellings. The 2000 Census also estimates that there are approximately 20,876 occupied single-family housing dwelling units with three bedrooms or more in Vallejo; and an estimated 6,713 (23.6 percent) units for large families in Vallejo. Of the total households (40,075) in the City, large families represent approximately 16.8 percent.<sup>13</sup> The statistical data provides a false sense of Vallejo having an adequate supply of units with three bedrooms or more; as documented in the Needs Assessment section of the Housing Element, the majority of single-family units suitable for large families

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<sup>13</sup> Draft City of Vallejo 2009-2014 Housing Element Update

will only be affordable to households near or above the State's moderate-income limits of 81 to 120 percent of the area median income.

## **2. Seniors**

According to the 2000 Census, the total number of elderly persons in Vallejo is 12,618. 1,123 elderly, or 8.9 percent of the total of 12,618, are living below the Federal poverty level. In addition, 2000 Census and HUD data indicate that there are 2,857 elderly owner households, and 1,501 elderly rental households, at 0 - 80 percent of the AMI. There are approximately 979 affordable rental units available for the elderly in Vallejo, which leaves an overall rental housing need gap among low income elderly of over 500 units.

## **3. Frail Elderly**

The total number of frail elderly, a subpopulation of the elderly, (65 years of age and over), in Vallejo was 2,595 persons in 2000, which is twenty-one percent of the total number of elderly, (12,618). The number of frail elderly living below the Federal poverty level is estimated to be 231 persons, (8.9 percent of 2,595). According to 2000 Census and HUD data, there are 915 frail elderly households in Vallejo at 0-80 percent of the area median income. There are currently 806 housing units available for frail elderly in this income category, leaving a gap / deficit of 109 housing units<sup>14</sup>.

## **4. Availability of Accessible and Disabled Housing**

Based on national estimates, seven percent of Vallejo's population age sixteen to 64 is physically disabled, i. e., has a disability that prevents them from working, has a self-care limitation, or has a mobility limitation. Disabilities can take on many forms and have numerous implications for housing need. Many disabled people are likely to have a high need for affordable housing due to their more severe condition and reduced employment opportunities. Accessible units are more expensive to build and can include features such as ramps, extra wide doors, handrails, lowered counters, raised toilets, and a variety of other accessibility features.

According to a 2000 Census estimate, Vallejo had proportionately more disabled persons than in Solano County overall, 21 percent as compared to 17.5 percent. According to the Draft City of Vallejo 2009-2014 2009 Housing Element Update, there are 42,261 disabled persons residing in Vallejo, which now represents over 36 percent of the City's population; however, this includes persons with multiple disabilities. The actual number of disabled individuals is 22,895 persons. A likely explanation for the disproportionately large disabled population (22,895 persons) in Vallejo is due to the fact that the City has a large number of

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<sup>14</sup> Draft City of Vallejo 2009-2014 Housing Element Update

board and care homes. In the late 1980s and early 1990s, residential property values in Vallejo were low. This allowed board and care home operators to purchase single-family homes inexpensively and outfit them for this use. Subsequently, this attracted large numbers of disabled clients, who may have had difficulty finding suitable accommodations in other communities, where costs were higher. Thus, the large disabled population in Vallejo may be related much as to the supply of available facilities than to the particular needs of residents of Vallejo itself. Nevertheless, it is still anticipated that housing for disabled persons is needed to meet the ongoing needs of Vallejo's disabled population.

According to the County of Solano Health and Social Services Department, in March 2010 there were an estimated 666 HIV and AIDS cases in Vallejo. The County estimates that there is a growing need for immediate emergency housing, rental assistance, housing with supportive services such as nursing homes, and increased home health care services for people with AIDS, an extremely fluid population. Additionally, an unmet housing need is that of the developmentally disabled: using national estimates, three percent of Vallejo's population, or 3,503 persons, is developmentally disabled. Meeting the housing needs of this population is difficult due to income constraints and often a lack of independence.

## **5. Homeless and At Risk of Homelessness Housing**

There are an estimated 253 homeless persons in Vallejo in any given month. This estimate is derived from the annual homeless count survey that was conducted on January 27, 2011 by Community Action Partnership of Solano (CAP Solano). HUD requests that a bi-annual homeless count be conducted by homeless and other social service providers, and that this include a street (unsheltered) count. CAP Solano is involved in oversight and coordination of homeless and social safety net services for extremely low-income persons on a County-wide basis. One of the key findings of this survey and count is that approximately 64 percent of homeless persons (162 of 253) on that night were unsheltered, i. e., not utilizing homeless services. Based on national estimates and periodic local homeless counts that have been conducted by service providers in the past, 30 percent of homeless persons are unsheltered, fifteen to twenty percent of homeless persons are chronically homeless, and persons with substance abuse addictions typically have the highest incidence of unsheltered homelessness

## **IV. Housing Supply and Conditions**

In 2008 there were a total of 43,840 housing units in Vallejo, with a homeownership rate of 70 percent, and renters making up 30 percent of the housing market. The growth rate in 2008 for single-family detached homes increased by 1.2 percent and decreased for multifamily developments of two-four units and five or more units by -0.6 and -1.3 percent respectively.

Similar to other cities in the region, the majority of Vallejo's housing stock is single-family, accounting for 74 percent of the total housing stock in 2008. According to the State Department of Finance, approximately fourteen percent of the City's housing units are in buildings with five or more units and nine percent are in buildings with two to four units. From 2000–2008, housing production in the County overall outpaced the City, averaging 1.5 percent annual growth compared to 0.6 percent annual growth for Vallejo. Vallejo's housing distribution by type remained relatively constant from 2000 to 2008, with single-family accounting for 70 percent of the City's housing stock. The slight growth of single-family homes was offset by a slight decrease in multi-family production.

The proportion of detached single-family units in Solano County increased on average each year between 2000 and 2008 by 1.6 percent and accounted for 71 percent of total housing units in 2008. Detached single-family housing increased by an annual average of 0.9 percent between 2000 and 2008<sup>15</sup>.

Vallejo's housing stock is comprised primarily of homes built prior to 1990 (81 percent), of which 46 percent were constructed between 1960 and 1970. It was anticipated that homes built prior to 1970 would be in need of major rehabilitation in order to preserve the safety and living standards of residents.<sup>16</sup> However, a more recent housing conditions survey was completed, (in 2008). Based on the findings of that survey, it was determined that of Vallejo's housing stock less than one percent of the homes fell in the category of needing substantial repairs and/or rehabilitation. Ninety percent of the homes were determined to be in sound condition or needed minor repairs. Roughly nine percent of the remaining units surveyed were in moderate condition needing one or more major repairs, such as a roof replacement and window repair replacement. This means that Vallejo's older housing stock, which makes up the majority of the City's entire housing stock, may be in need of significant rehabilitation.

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<sup>15</sup> Draft City of Vallejo 2009-2014 Housing Element Update

<sup>16</sup> Draft City of Vallejo 2009-2014 Housing Element Update

**Table 8. Vallejo Housing Stock Age, 2008**

| Year Built    | Structure | Units Built | % of Total Units |
|---------------|-----------|-------------|------------------|
| 1999 – 2008   |           | 4,086       | 9%               |
| 1995 – 1998   |           | 1,040       | 2%               |
| 1990 – 1994   |           | 2,511       | 6%               |
| 1980 – 1989   |           | 8,795       | 20%              |
| 1970 – 1979   |           | 6,439       | 15%              |
| 1960 – 1969   |           | 4,947       | 11%              |
| Prior to 1960 |           | 15,299      | 35%              |
| Total         |           | 43,117      | 100%             |

Claritas, 2008

## **V. Evaluation of Jurisdiction's Current Fair Housing Legal Status**

According to HUD's San Francisco Region IX Office, during the period of January 2000 through October 22, 2010, the City of Vallejo had a total of 61 Title VIII complaints filed and closed, with a total compensation pay out during the referenced period in the amount of \$104,241. Fair housing complaints were filed with HUD, or with a Fair Housing Assistance Program (FHAP) provider.

The Vallejo Housing Authority has recently had two alleged Title VIII complaints filed against the Vallejo Housing Authority, and two Housing Authority employees; one complaint was successfully mediated with the VHA agreeing to grant the complainant, as a reasonable accommodation, an eleven month extension of their Housing Choice Voucher; the remaining complaint is currently pending resolution.

**Table 9. Title VIII Complaint Categories**

| Race | Color | National Origin | Sex | Disability | Familial | Total |
|------|-------|-----------------|-----|------------|----------|-------|
| 21   | 4     | 3               | 4   | 28         | 12       | 72    |

Note: A case may have multiple bases.

## **VI. Identification of Impediments to Fair Housing Choice**

### **Impediment 1. Lack of Affordable Housing – Regulatory Constraints**

The City's Draft Housing Element Update identifies categories of governmental constraints that often influence housing production. These factors include: land use and development, building codes and enforcement, site improvements, fees and local processing, and permit procedures<sup>17</sup>. Additionally, the State Department of Housing and Community Development (HCD) Report "Raising the Roof" provides even greater detail on the constraints that California developments experience when navigating through the approval/land entitlement processes, which have been characterized as the most detailed and complicated in the nation. The HCD report focuses on California's project approval process that requires three distinct reviews. The first is the process as set forth in State planning and environmental laws and local codes. It consists of formal requirements, procedures, and steps for reviewing, evaluating, and approving or denying project applications. The second is the process as actually administered, which is considered highly discretionary and affords local governments tremendous bargaining power over project sponsors. The third process is one that citizens establish for themselves and their communities through the initiative process<sup>18</sup>.

**Recommendation.** 1) To the extent possible establish a streamlined permitting process for the development of affordable housing projects; 2) allow concurrent processing; 3) zone land for multi-family without a Conditional Use Permit (CUP); and 4) develop written design standards.

It is important to note that the City of Vallejo is currently undergoing a reorganization that will create an Economic Development Department, which will house the Planning and Building Divisions. One objective of the to-be-created Economic Development Department is to improve the efficiency and effectiveness of the permitting process in order to attract new development opportunities to the City.

### **Impediment 2. Lack of Affordable Housing - Zoning and Land Use Policies**

The City has identified a need for approximately 2,900 units of affordable housing in Vallejo. The City's current land use controls offer limited options for new construction of low- and moderate-income housing due to the existing low density zoning for multi-family dwellings of 27 units per acre that are in place, and/or the requirement of a CUP for multi-family housing. The low-density zoning has a negative impact on the potential housing cost and feasibility of creating affordable housing units, (more units per acre mean lower costs per unit)<sup>19</sup>.

**Recommendation.** The State has generally held that the most appropriate way for

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<sup>17</sup> Draft City of Vallejo 2009-2014 Housing Element Update

<sup>18</sup> Raising the Roof—California Housing Development Projections and Constraints 1997 - 2020

<sup>19</sup> Draft City of Vallejo 2009-2014 Housing Element Update

jurisdictions to provide adequate sites to meet the needs of lower income households is to provide land zoned for higher-density multi-family housing in addition to land for lower-density multi-family and single-family housing. A HCD California Planning Roundtable Report indicates that higher density residential developments require less extensive infrastructure than sprawl developments, and that higher density developments create economies of scale, and promote economic development,

Thus, the Draft City of Vallejo 20092-14 Housing Element Update indicates that should Vallejo's existing inventory of vacant residential land prove inadequate to accommodate the City's remaining unmet need for housing development in the future, the City will mitigate this constraint by:

- using non-residential (i. e., commercial or industrial) sites that could be re-zoned for mixed-use
- converting older public/institutional/commercial buildings to residential use through adaptive reuse or historic preservaton
- revising the City's local density bonus ordinance that currently allows a density bonus only for projects in Planned Development (PD) zones; the City will also model its density bonus ordinance after the State's density bonus model to ensure conformance with State law
- recommending removal of the CUP requirement for multi-family housing by December 2011

### **Impediment 3. Special Needs Housing/Emergency Shelter Housing for Families and Individuals**

The City's Consolidated Plan has identified a need for transitional housing, permanent supportive housing, and permanent housing for homeless families and individuals. These populations generally have extremely low incomes, defined as household income at or below 30 percent of AMI; *and* have chronic health conditions that are at least episodically disabling, such as mental illness, HIV/AIDS, and/or substance use issues, and/or face other substantial barriers to housing stability (such as experiences of domestic violence or other trauma, or histories of out of home placements); *and* are not able to obtain or retain appropriate stable housing without easy, facilitated access to services focused on providing necessary supports to the tenant household. These target populations include people who may be homeless (for any length of time) or are at risk of homelessness, and includes those who may be leaving other systems of care without a place to live, such as (1) young people aging out of foster care, (2) people with mental illness or other disabilities leaving jail or prison, and (3) some members of the elderly population that would qualify as a special needs population.<sup>20</sup>

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<sup>20</sup> Corporation for Supportive Housing (CSH): What is Supportive Housing? (Understanding Permanent Supportive Housing Section of CSH's Toolkit for Developing and Operating Supportive Housing)

## **Recommendation.**

- amend the City's Zoning Ordinance to ensure compliance with State law to mitigate constraints to housing for special needs populations by providing clear definitions of group care facilities
- permit small group facilities (six or fewer) by-right in all residential zones
- permit group home facilities (seven to twelve persons) in both Medium Density Residential and High Density Residential zones without the need for a major CUP
- encourage apartment or SRO buildings or townhouses to mix special-needs housing with general affordable housing with the appropriate level of built-in supportive services
- encourage the Housing and Community Development Division, and the Planning Division, to continue to work collaboratively on jointly identified barriers and/or constraints to the production of housing

## **Impediment 4. NIMBYism (Not in My Back Yard)**

Community opposition to affordable multi-family housing developments, and affordable housing subsidy programs targeted to low-income households. The City of Vallejo has seen an increase in the level of bias directed at the creation of affordable housing developments, and programs that target low and moderate income households. These biases often stem from unproven myths related to affordable housing developments and/or the mistaken belief of perceived negative impacts, such as decreased property values, increased crime, and parking congestion, when affordable housing developments, and rental subsidy programs, such as the Housing Choice Voucher program (HCV), come to communities. Though community members may have legitimate concerns, the concerns listed have proven to be unsubstantiated.

The California Planning Roundtable wrote a report entitled: "Myths and Facts about Affordable and High Density Housing". The report tackled several myths associated with affordable housing developments. They include: Myth 1 - High-density and affordable housing will cause too much traffic. Fact 1 – As reported by HCD, people who live in affordable housing own fewer cars and drive less. HCD reports that three-fourths of households living below the poverty line own no vehicles or only one car, compared to 54 percent of all California households and 44 percent of homeowner households. Lower car ownership rates mean fewer trips, and fewer single occupant auto commutes; Myth 2 – Affordable Housing reduces property values. Fact 2 – No study in California has ever shown that affordable housing developments reduce



property values<sup>21</sup>. The HCD report further states that the single most significant factor affecting property values is the preexisting value of the land in a given property. Architectural standards and adequate maintenance also strongly influence property values, particularly as they apply to affordable rental properties. Properly maintained affordable housing developments designed and built with sensitivity to the architectural and aesthetic standards desired by the community may even increase property values<sup>22</sup>. Myth 3 – High-density and affordable housing increases crime. Fact 3 – The design and use of public spaces has a far more significant effect on crime than density or income levels.

With the recent recommendation by local City officials to adopt a Chronic Nuisance Ordinance, some community members have become alarmed that elected City officials, business community leaders, and some local residents are becoming intolerant, and indifferent to the socioeconomic needs of all Vallejo residents; one of Vallejo's strengths is its ethnic, racial, and economic diversity. In an effort to preserve that ethnic, racial, and economic diversity, the City is mandated to ensure that it has sufficient housing opportunities for all Vallejo household income levels.

**Recommendation.** The City will strive to eliminate negative NIMBY attitudes and biases through an improved educational outreach program that will focus on fair housing educational activities designed for the general public and specific targeted groups that are underrepresented. The following educational outreach activities will be completed on an annual, semiannual, and/or quarterly basis:

- the City of Vallejo will send annual Fair Housing Notices to community Neighborhood Associations and non-profit organizations informing them of the City's Fair Housing Program in April
- Fair Housing information will be distributed to all the Chambers of Commerce in Vallejo including the African American, Filipino, and Hispanic Chambers
- Fair Housing information will be given to new participants of the Housing Authority's Housing Choice Voucher and Project Based Voucher Programs
- information regarding Housing and Community Development programs and services will be prepared in English, Spanish, and Tagalog for distribution to the public
- Fair Housing advertisements/brochures will be sent to Vallejo public schools twice a year
- Fair Housing advertisement/brochures will be sent to City of Vallejo Water Department customers twice a year in their water bill statement
- Fair Housing advertisements/brochures will be prepared in English, Spanish, Tagalog, and Chinese

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<sup>21</sup> Paul Cummings and John Landis 'Relationships Between Affordable Housing Developments and Neighborhood Property Values' (Berkeley: University of California Institute of Urban and Regional Development, 1993)

<sup>22</sup> California Department of Housing and Community Development, the Effects of Subsidized and Affordable Housing on Property Values: A Survey of Research (Sacramento: DHCD, 1988),2

- the City will conduct and/or coordinate a Fair Housing Workshop annually, in April
- every quarter the City will place a non-discrimination ad in the Times-Herald, the California Apartment Association publication, and various ethnic newspapers
- Fair Housing posters/flyers will be made available for City of Vallejo personnel and the general public
- the City will identify an appropriate staff person and/or Human Rights Commissioner to refer complaints of discrimination, in addition to referring alleged cases of discrimination to Legal Services of Northern California (LSNC)
- the City will participate in Fair Housing Month activities in April of every year. During the month Housing staff will:
  - prepare a City Council Proclamation or Resolution
  - prepare a City TV Public Service Announcement
  - place ads in the Times-Herald and ethnic newspapers
  - meet consistently with rental property owners/place ads in the California Apartment Association newsletter

**Impediment 5. Geographic Concentrations of Low and Very Low-income and Minority Persons**

**Recommendation.** The Housing Authority of the Housing and Community Development Division will continue to work to achieve the geographic deconcentration of low and very low-income, and minority households, in Vallejo. Such efforts will include:

- the inclusion of maps that identify those areas of low and high concentrations of poverty
- recruitment of property owners outside of areas of poverty and/or minority concentration
- coordination of semi-annual HCV “workshop” events that provide HCV program information to interested property owners with eligible investment properties, and property managers

**Impediment 6. Lack of Knowledge Regarding Americans with Disabilities Act (ADA) Compliance and Reasonable Modifications and Accommodations for the Disabled**

**Recommendation.** It is the intent of the Housing Authority and the Housing and Community Development Division as a whole to ensure that persons with disabilities have full access to the Housing Authority and Housing and Community Development Division’s programs and services by allowing reasonable accommodations in its rules, policies, practices or services when such accommodations may be necessary<sup>23</sup>. Types

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<sup>23</sup> Housing Authority of the City of Vallejo Administrative Plan for the HCV Program

of reasonable accommodation may include, but will not be limited to the following:

- permitting applications and reexaminations to be completed by mail
- providing time extensions for locating a unit when necessary because of lack of available accessible units or special challenges of families seeking a unit
- permitting an authorized designee or advocate to participate in the application certification process and any meetings with Housing Authority staff
- displaying posters and other housing information in locations easily readable from a wheel chair
- using higher payment standards (either within the acceptable range or with HUD approval of a payment standard outside the VHA range), if the VHA determines this is necessary to enable a person with disabilities to obtain suitable housing
- continue mandatory Fair Housing and Reasonable Accommodation trainings by staff every two years, and recommend training for City Commissioners
- development of brochures/flyers notifying Housing Authority landlords, property managers, and tenants regarding Fair Housing laws
- encouragement of landlords and property managers to willingly make reasonable modifications to their properties to accommodate the disabled
- look into the feasibility of establishing an accessibility modification program within the City's existing Rehabilitation Loan Program that would allow property owners to make accessibility modifications to their units

## **VII. Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction**

### **A. Geographic Concentrations of Low and Very Low-income Persons**

The Housing and Community Development Division and Housing Authority continually work to achieve the geographic deconcentration of low and very low income households in Vallejo. Such efforts include: the inclusion of maps that identify those areas of low and high concentrations of poverty; recruitment of owners outside of areas of poverty or minority concentration through semi-annual landlord briefings; distribution of printed flyers about the HCV program to property owners and managers annually; and maintaining working relationships with real estate broker associations, tenant organizations, and apartment associations.

### **B. Homeless Housing**

The City will work towards the successful securing of available funding sources that target homeless populations; and work collaboratively with the Planning

Division in the development of zoning that will allow for the development of emergency shelters and transitional housing. Additionally, the City will continue to coordinate access and/or funding to social service organizations (as such funding sources remain available, e. g., Community Development Block Grant Program funds) that can further provide outreach and linkages to existing supportive services to foster independent living and homeless prevention. City linkages and/or funded services may include but not be limited to: employment counseling centers, financial money management, drug counseling, and mental health prevention.

**C. Rehabilitation Loan Program**

The City currently contracts with a non-profit housing organization, Vallejo Neighborhood Housing Services, Inc. (VNHS) to implement the City's Housing Rehabilitation Loan Program. The Rehabilitation Loan Program provides below market rate interest loans for the rehabilitation of owner-occupied single-family residences, to assist low-income households at or below 80 percent of the AMI. The intent of the Rehabilitation Loan Program is to act as a last resort lender for those income-qualified households that are unable to secure conventional lender financing for emergency repairs and deferred maintenance items needed to eliminate blight, and maintain the useful life of the property.

Homeowners that are provided rehabilitation funds are required to enter into an affordability covenant that restricts their ability to cash in on equity until the rehabilitation loan is repaid.

**D. Housing Authority's Housing Choice Voucher (HCV) Home Ownership Program**

Current Housing Choice Voucher recipients may be eligible for the Voucher Home Ownership program, which allows the HCV recipient to use their voucher subsidy toward a mortgage payment instead of a monthly rental subsidy.

**E. Neighborhood Stabilization Program (NSP)**

In 2009, the City of Vallejo was awarded \$2.7 million of NSP funding made available through the Housing and Economic Recovery Act of 2008; and more recently, the City was awarded an additional \$1.7 million of NSP funding through the Dodd-Frank Act passed in July 2010. The intent of the NSP funds is to stabilize neighborhoods, and attempt to stop declining values by acquiring, rehabilitating, and reselling foreclosed and/or abandoned properties, in an effort to eliminate blight. Twenty-five percent of the NSP funding must be set-aside for households at or below 50 percent of the AMI; the remaining 75 percent of

funds can be used to house households with incomes up to 120 percent of the AMI.

**F. Homebuyer Down Payment Assistance Program (DPA)**

The City of Vallejo contracts with VNHS to implement the City's First Time Homebuyer/Down Payment Assistance Program. The DPA program provides the lesser of 20 percent of the purchase price or a maximum \$40,000 second mortgage at a below market interest rate of three percent. Assistance is restricted to first time homebuyers whose household income is at or below 80 percent of the AMI. Additionally, the City's DPA program provides up to a three percent closing cost grant.

**G. Homeless Prevention Program**

The City of Vallejo is currently analyzing the benefit of creating a Homeless Prevention Program. The program would provide: up to two months of past due rent to low income renters at or below 60 percent of the AMI that are in jeopardy of being evicted due to an unforeseen life emergency and/or hardship that prevented the tenant from making their rent payment, or first month rent and/or security deposit up to a maximum established amount. Subsidies would be a one-time benefit provided to low income residents of non-subsidized developments. Program establishment is contingent upon approved City Council funding and confirmation of the program meeting established housing priority needs for homeless populations as identified in the Consolidated Plan.

## **VIII. Private Sector Impediments to Fair Housing and Furthering Housing Choice**

**Impediment 1. Predatory Lending** The housing crisis of 2007 highlighted the damaging financial effects of predatory lending on individuals, households, and communities, especially communities-of-color<sup>24</sup>. Predatory lending is when a lender<sup>25</sup>:

- knowingly lends a borrower more money than they can afford to repay
- charges high interest rates to borrowers based on their race or national origin and not on their credit history
- charges unnecessary and/or exorbitant fees for nonexistent products and services
- pressures borrowers to accept higher-risk loans such as balloon loans, interest-only payments, and steep pre-payment penalties
- strips homeowners of equity from their homes by convincing them to refinance again and again, when there is no benefit to them

**Recommendation.** To prevent possible predatory lending in Vallejo, the City will work with organizations such as VNHS and Solano Napa Habitat for Humanity, whose mission is to expand homeownership opportunities for very low- and low-income first time homebuyers.

- City will continue to utilize Federal CDBG/HOME Program funding subsidies to provide a three percent below market interest rate loan for first time homebuyers in an amount of the lesser of 20 percent of the purchase price, or a maximum of \$40,000; this will ensure that low-income borrowers have access to financing that will promote stability
- City will continue to contract with housing counseling agencies to provide HUD-approved homebuyer purchase and post-purchase counseling classes to Vallejo residents interested in becoming homeowners
- VNHS will sponsor a Homebuyers Club of ongoing workshops to help first time homebuyers qualify for financing, assist in locating affordable housing, and determine if the home selected is a good buy. VNHS and Habitat will also participate in purchase and refinance/rehabilitation loan programs, using the City's NSP Program funds, to enhance access to the home purchase market for low-income persons

**Impediment 2. Realtor Steering** Though realtor steering has not been confirmed as a continued barrier to promoting fair housing and the furthering of housing choice, given that there are high concentrations of minority groups in certain geographic

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<sup>24</sup> Paying More for the American Dream

<sup>25</sup> HUD

areas, the City is concerned that real estate agents and property managers may have tendencies to steer potential homebuyers, and renters, to neighborhoods based on race.

**Recommendation.** The City will encourage realtors and property managers to promote Fair Housing by scheduling presentations semi-annually at the local Solano Board of Realtors breakfast meetings, and forwarding annual brochures/flyers regarding Fair Housing and Furthering Housing Choice.

**Impediment 3. Bias Towards Housing Choice Voucher (HCV) Participants, and Subsidized Affordable Housing Developments**

Based on copies of posted blogs from the Vallejo Independent Bulletin and the Times-Herald that were presented to the City that cover a time span from 2008 through the current year, a segment of the Vallejo population appears to have disdain for low-income households and affordable housing in general. A probable conclusion is that HCV participants may encounter bias in their quest to secure quality affordable housing in areas of low crime, near good schools, and that provide access close to jobs.

**Recommendation.** The VHA will embark on an educational public relations program to educate Vallejo residents, businesses, and community groups about the various Housing Authority programs and tenant eligibility requirements, in an effort to dispel misconceptions about HCV participants. Additionally, the City will work with the Housing Authority Resident Advisory Board (RAB) to provide HCV participants with empowering resources and educational tools to deal with biases in pursuing their housing choice.

## IX. Survey Questionnaire Results

The City of Vallejo administered a Fair Housing Survey in the Fall of 2010. The intent of the survey was to garner whether Vallejo residents understood the definition of Fair Housing, and that Fair Housing is the Law. Additionally, the intent was to assess whether or not residents knew who to contact in the event they believed they had been discriminated against in their attempt to secure housing. The survey was made available to the entire City of Vallejo; initially, the survey was presented to just HCV participants. However, based on feedback from LSNC and the Western Center on Law and Poverty the survey outreach was expanded. Of the 37 respondents, the following survey results were captured:

- 1) 85 percent (30) of respondents stated they understood the definition of Fair Housing and/or were aware of the Fair Housing Act of 1968 that prohibits discrimination in buying, selling, renting, lending, or any other real estate transaction to any person, based on race, color, religion, national origin, family status, or disability.

14.3 percent (5) stated they were not aware of the Fair Housing Act of 1968.

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- 2) 85.7 percent (30) of respondents indicated that they had never been denied access to housing nor had their housing limited based on any of the Title VIII protected classes.

11.4 percent (4) indicated that they had experienced some form of discrimination in their attempt to secure housing.

2.9 percent (1) indicated that they were unsure if they had encountered some form of discrimination in their attempt to secure housing.

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- 3) 66.7 percent (4) of the respondents that reported experiencing some form of discrimination in their attempt to secure housing indicated that the discrimination was perpetuated by either a landlord or property management agent.

33.3 percent (2) indicated the discrimination was perpetuated by a Real Estate Agent.

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- 4) 50 percent (3) of those that experienced some form of discrimination indicated the discrimination occurred in an apartment complex or condo development.

The remaining 50 percent (3) of respondents that experienced some form of discrimination indicated the discrimination occurred in a single-family residence/neighborhood.



- 5) Respondents that believed they were discriminated against reported it was on the following basis:  
Race: 16.7 percent  
Gender: 16.7 percent  
Source of Income: 16.7 percent  
Disability: 16.7 percent  
Other: 33 percent
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- 6) 7.7 percent (2) of respondents that reported experiencing some form of discrimination actually reported the incident.
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- 7) Respondents were asked what agency/office they would contact for help regarding being denied access to housing based on the Title VIII protected classes. Their responses include the following agencies/offices:

14 respondents would contact VHA  
12 respondents were unsure what agency to contact  
7 respondents would contact HUD  
3 respondents would contact State Dept. of Fair Housing and Employment  
1 respondent would contact the Police Department

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- 8) 91.4 percent (32) of respondents believed there was a need for more housing programs targeting low- and moderate-income households.

8.6 percent (3) said no additional programs targeting low- and moderate-income households were needed.

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- 9) 48.5 percent (16) respondents reported that it would be harder for them to obtain their current residence in today's market.  
21.2 percent (7) indicated it would not be harder.  
30.3 percent (10) indicated it may or may not be harder or easier to obtain their current residence in today's market.
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- 10) Respondents indicated the following attributes they look at when selecting a neighborhood/home to reside:

82.9 percent (29) – Low crime  
31.4 percent (11) – Close to jobs  
57.1 percent (20) – Near good schools  
62.9 percent (22) - Affordable homes/rents

34.3 percent (12) – Short commute  
51.4 percent (18) – SFR  
20 percent (7) - Mixed use/multi-family  
11.4 percent – (4) other

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11) 82.4 percent (28) of respondents indicated that their current housing choice reflects the housing attributes they identified when selecting a neighborhood.

17.6 percent (6) indicated that their current housing did not reflect the attributes they look at when selecting a neighborhood.

Three skipped the question.

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12) 70.6 percent (24) of survey respondents indicated that they believed they had a choice to live in all areas of Vallejo, 26.5 percent (9) indicated they did not believe they could live in all areas of Vallejo, and 2.9 percent (1) were unsure if they could live in all areas of Vallejo. Three answered other, in which respondents expressed a concern about being able to live in low crime areas. Three skipped the question.

13) There were four responses to survey questions 13 – 15, which were directed to lenders and/or appraisers, which indicated that they offered community lending programs in Vallejo and/or Solano County.

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14) There were three responses to survey question 14, which asked what type of community lending programs were available to Vallejo residents; three indicated that First Time Homebuyer Loan Programs were offered, two indicated small business loans, one indicated job creation activities, and one indicated below market financing for Vallejo residents. Participants were able to select multiple programs.

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15) There were zero responses to survey question 15, which asked for Vallejo lending percentages, and the combined dollar valuation of the loans made in Vallejo.

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16) Respondents were asked to identify the type of housing they would like to see in Vallejo.

51.6 Percent (16) indicated single-family homeownership  
29 percent (9) indicated affordable multi-family rental housing

19.4 percent (6) indicated high-end luxury/multi-family rental housing

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17) Respondents were asked to indicate which field best represented them. They responded as follows:

3.6 percent (1) - real estate agency  
82.1 percent (23) - renter/homeowner  
14.3 percent (4) - other

X. **Attachment: Audit Report on Racial Discrimination in Email Responses**

Racial Discrimination in Email Responses to Online Housing Ads Audit Report, prepared by Fair Housing of Marin.

**Racial Discrimination in Email Responses to Online Housing Ads  
Audit Report**

**I. INTRODUCTION**

Fair Housing of Marin ("FHOM") conducted a total of 63 tests in four locations across Solano County between July and October 2009. Each test consisted of email inquiries from three separate email addresses. The modest number of tests conducted limits the applicability of the conclusions drawn therefrom, but some general trends emerge.

**II. BACKGROUND**

In the early part of the decade FHOM began monitoring rental housing ads on Craigslist, the largest internet advertising site in the world, with 450 sites in all 50 U.S. states and 50 countries. Each month, per the Craigslist fact sheet, 14 million news ads are received and viewed by 15 million people. Many people search for housing online and this method is rapidly replacing searching through newspaper ads. Google and ComScore 2005 estimate 56% of online housing searches are actively looking for housing. Testing for rental discrimination and ethnicity in names was conducted by two university professors; the results were published in the Journal of Applied Social Psychology in 2006<sup>1</sup>. This testing project sent email inquiries to landlords advertising vacancies in Los Angeles County using an Arabic, African-American and White implied name. African-American and Arab names received significantly fewer positive responses than the White name, with the African-American name receiving the fewest<sup>2</sup>. Given the local market, FHOM used Latino, African-American, and White implied names.<sup>3</sup>

**III. GEOGRAPHIC SCOPE**

Solano County was tested, focusing mostly on the major municipalities of Vacaville, Fairfield, Vallejo, and Benicia. The greatest number of rental units advertised on Craigslist in Solano County are (in descending order): Vallejo, Fairfield, Vacavill, Benicia, Suisun City, and Cordelia, with occasional ads for Rio Vista, Birds Landing, Collinsville, Liberty Farms, Libfarm, and Elmira, all much smaller towns in Solano County. FHOM conferred with Legal Services of Northern California to determine the appropriate number of email tests to conduct in each municipality. LSNC suggested balancing the numbers somewhat for the three major cities. Since their populations are similar, reasoned LSNC staff, one could justify similar numbers of inquiries for the three major cities, even though there are currently more units available in Vallejo, particularly as the likelihood of discriminatory responses may be higher in Vacaville and some of the more rural areas. Vallejo is very diverse and LSNC has few allegations of racial or ethnic discrimination there.

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<sup>1</sup> <http://www.RentMarketer.com>

<sup>2</sup> "Rental Discrimination and Ethnicity in Names"; Adrian G. Carpusor and William Loges, Journal of Social Psychology, 2006, 36, 4 pp. 934-952

<sup>3</sup> Between 1990 and 2000, the White population in Solano County decreased from 61% to 50%, while the Asian and African-American populations both grew by 2% making up 13% and 15% of the population. Latinos increased by 53% from 45,517 to 69,598, and account for 18% of the County's population.

#### IV. METHODOLOGY

##### Test Profiles and Scripts

FHOM set up 3 email accounts with three different providers for the names which sound stereotypically Latino, African-American, and Caucasian-American. FHOM surveyed a number of people/Craigslist ads for homes in Sonoma County to test the assumption of what ethnicity or race the average person would associate with each of these names. FHOM chose to use male names for two reasons – the issue of discrimination of families with children was less likely to confuse the issue of race and national origin, and because of the stereotype that housing providers might be more intimidated by African-American or Latino males.

FHOM used a separate script, with different wording (including salutations and closing comments) and formatting, but asking about availability and when the unit could be viewed.

##### Characteristics of Property to be tested

Tests were run on ads being advertised on the same day, to help weed out some older ads where housing providers might stop responding to inquiries because they had already rented the unit or at least had some good prospects. A cap of \$3,000 was put on the rent. FHOM tested apartment complexes advertised on Craigslist, to ensure that properties are covered by federal fair housing laws. Shared homes were not be tested, nor were vacation homes or short-term rentals. Emails were sent out, spaced out at intervals of at least 2 hours whenever possible.

#### V. AUDIT FINDINGS

##### Types of Differential Treatment

FHOM performed sixty-three matched tests in response to apartment advertisements in Solano County: 17 in Fairfield, 15 in Vacaville, 21 in Vallejo, and 10 in all other areas of Solano County. Of those 63 matched tests, the stereotypically African American name (hereafter "African-American tester") received 55 responses, for an 87.3% rate of return; the stereotypically Latino name (hereafter "Latino tester") received 52 responses, for an 82.5% rate of return; and the stereotypically Caucasian name (hereafter "Caucasian tester") received 53 responses, for an 84.1% rate of return. In each test, the African-American tester emailed his inquiry first, followed by the Latino tester and finally the Caucasian tester. Because the Caucasian tester inquired last, FHOM expected he would receive the fewest responses. Although the difference in number of responses between the three testers was negligible, the time elapsed between inquiry and response, the content included in the response, and the tone of the response did differ between testers in several significant instances. In addition, several instances in which the landlord responded only to one or two testers to the exclusion of the other tester(s) indicated potential discriminatory preferences.

Generally, the Latino tester received a response in the shortest time: an average of 3.77 hours elapsed between the inquiry and the response in each instance where he inquired about an advertisement. For the Caucasian tester, an average of 4.17 hours elapsed between inquiry and

response. Finally, landlords responded to the African-American tester on average 4.22 hours after initial inquiry.

In Fairfield, the Caucasian tester received the quickest responses on average, followed by the Latino tester. The average time between initial inquiry and response for the African-American tester was 7.13 hours; for the Latino tester, 7.02 hours elapsed on average, while for the Caucasian tester, 6.2 hours elapsed on average. However, in both Vacaville and Vallejo, the Latino tester received a response in *less* time on average than either the Caucasian or African-American testers. The average time between inquiry and response in Vacaville was as follows: 2.06 hours for the Latino tester, 3.53 hours for the African-American tester, and 3.83 hours for the Caucasian tester. Similarly, in Vallejo, the average response time was 5.14 hours for the Latino tester, 5.65 hours for the Caucasian tester, and 5.81 hours for the African-American tester. In all other areas of Solano County, however, African-Americans received responses in the shortest average response time, at 23.5 minutes, as compared to the Latino tester at 51.2 minutes and the Caucasian tester at 53.7 minutes.<sup>4</sup>

### Vacaville

**In the city of Vacaville, the African-American tester received worse treatment than one or both of the other testers in 33% of tests. In 20% of tests, the Latino tester received worse treatment than one or both of the other testers.**

- Two tests: Although the African-American tester replied first, only the Latino and Caucasian testers received responses.
- One test: Although the African-American tester replied first, only the Latino tester received a response.
- One test: Only the African-American and Caucasian testers were explicitly told that the unit was still available; the agent and/or landlord asked the Latino tester to clarify whether his inquiry was in response to "Kingman" or "Marshall Duplexes" but did not state whether a unit was available. Further, in this same test, only the Caucasian tester was given a specific opportunity to see the unit, the building's address, and a phone number at which to contact the landlord, in a reply email signed by the landlord and/or agent.<sup>5</sup>
- One test: Only the Caucasian tester was asked if a same-day showing would work for him. Although both the African-American and Latino testers inquired as to viewing the apartment, the landlord and/or agent's response to both inquiries only stated the location of the apartment in terms of its distance from Suisun City, and asked if that location worked for the prospective tenant.

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<sup>4</sup> Calculation of the average time elapsed between initial inquiry and response based on the total number of responses received by that individual tester, not by the total number of responses received generally. Data points wherein all three testers received responses more than 24 hours after the time of the initial inquiry excluded from average calculation.

<sup>5</sup> Some differences in tone and content of responses may be attributable to different authors.

Vallejo

**In the city of Vallejo, the African-American tester received worse treatment than one or both of the other testers in 24% of tests. The Latino tester received worse treatment than one or both of the other testers in 9% of tests.**

- Two tests: The Latino tester did not receive a response at all, although inquiry was made after the African-American tester but before the Caucasian tester.
- Three tests: The African-American tester did not receive a response at all, although inquiry was made before the Latino and Caucasian testers.
- One test: Only the Latino and Caucasian testers were explicitly invited to follow up with the landlord and/or agent. Although the landlord's response to the African-American tester indicated a window of opportunity to view the unit, he did not explicitly invite the African-American tester to confirm whether that time suited him.
- One test: Only the Latino and Caucasian testers received responses, although the African-American tester inquired at an earlier time. The landlord and/or agent sent subsequent emails to the Latino tester, offering multiple viewing opportunities and requesting that Latino tester follow up if still interested. The landlord and/or agent signed his communications with the Latino tester, but not with the Caucasian tester.

Fairfield

**In the city of Fairfield, the African-American tester received worse treatment than one or both of the other testers in 29% of tests. The Latino tester received worse treatment than one or both of the other testers in 12% of tests.**

- Interestingly, this apartment was tested twice with different results: once on August 6, 2009, and again on November 4, 2009. In the first test, only the Latino tester received a response to his inquiry. In that response, the landlord and/or agent stated that units were available, and invited the Latino tester to schedule a viewing. In the second test, although the African-American and Latino testers inquired earlier, only the Caucasian tester received a reply from the landlord and/or agent. In that response, the landlord and/or agent stated that units were available, and invited the Caucasian tester to schedule a viewing.
- One test: Only the African-American and Caucasian testers received responses, although the Latino tester inquired before the Caucasian tester.
- One test: Only the Latino and Caucasian testers received follow-up emails two days after the initial inquiry and response, in which the landlord and/or agent stated that the apartment would be available for viewing that weekend. Although the African-American tester received a response to his initial inquiry, he was not invited to view the apartment in subsequent communications like the Latino and Caucasian testers.
- One test: Although all three testers received responses, the tone was noticeably more polite in the response to Latino and Caucasian testers. The landlord and/or agent did not use a salutation in her response to the African-American tester and ordered, rather than offered, the African-American tester to call the office to set up an appointment.



- One test: Although the landlord and/or agent responded to all three testers, he used courtesy language only in his response to the Latino tester.

All Other Areas of Solano County

**In all other areas of Solano County, the African-American tester received worse treatment than one or both of the other testers in 60% of tests. The Latino tester received worse treatment than one or both of the other testers in 40% of tests.**

- One test: Although the African-American and Latino testers sent inquiries earlier, only the Caucasian tester received a response.
- One test: Only the African-American and Caucasian testers received responses.
- One test: The African-American tester received a much terser response than the Latino or Caucasian testers; the Latino and Caucasian testers received responses with salutations, courtesy language, and contact details.<sup>6</sup>
- One test: Although each tester received a response, there was a noticeable difference in tone and language usage between the response to the African-American, Latino, and Caucasian testers. The Caucasian tester received the most polite and exhaustive response. In the response to the African-American tester, the landlord and/or agent merely noted that the unit was available, and inquired as to when a good time was for the tester to tour the apartment. The landlord and/or agent did not use a salutation, did not employ courtesy language, and did not sign his or her name to the email. In contrast, in response to the Latino tester, the landlord and/or agent greeted the prospective tenant by name, stated that he or she would “love” to show the apartment, and requested that the Latino tester provide a contact number so that the landlord and/or agent could follow up. In further contrast, in response to the Caucasian tester, the landlord and/or agent included not only a salutation by name and a request for the tester’s contact phone number, but also information about the hours during which the unit could be shown and a signature block, including the agent’s name.
- One test: Although each tester received a response, the landlord and/or agent’s response to the African-American tester contained the least information. To the African-American tester, the landlord and/or agent merely responded that the unit was still available, and inquired as to when the tester would be able to come by. However, to the Latino tester, the landlord and/or agent stated the office’s business hours, invited the tester to come by any time, and inquired after the tester’s plans to move. Similarly, in response to the Caucasian tester, the landlord and/or agent offered a time to see the unit and invited a response.
- One test: Although each tester received a relatively detailed response, only the Caucasian tester was invited to provide the landlord and/or agent with his cell phone number so that the landlord and/or agent could follow up and schedule a showing the next week.
- One test: Only the African-American and Caucasian testers received replies, and the tone and information provided within those replies differed. For the African-American tester, the landlord and/or agent inquired as to whether the tester had previously called, stated that the apartment was located in Benicia, and signed his name. For the Caucasian tester,

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<sup>6</sup> The person who responded to the African-American tester was not the same individual who responded to the Latino or Caucasian testers.

however, the landlord and/or agent asked that the tester call him immediately, offered to show the house at a specific time the next day, and included his phone number.

## VI. CONCLUSIONS DRAWN BY FAIR HOUSING OF MARIN

### 1. Availability and Access

*Whether a landlord and/or manager responds to a prospective tenant's inquiry, as well as the length of time that elapses between the initial inquiry and the landlord and/or manager's response, can be indicative of a landlord and/or manager's interest in making housing accommodations available.*

Taken generally, response data does not show a trend towards discriminatory treatment based on race. All three testers received a statistically similar number of responses to their individual inquiries. However, there were several notable instances in which either the African-American or Latino tester was subjected to differential treatment. **In 14% of tests, the African-American tester did not receive a response to his inquiry while the Caucasian and/or Latino tester did receive a response, despite the fact that the African-American inquired prior to either of the other two parties. In 16% of tests, the Latino tester did not receive a response but the African-American and/or Caucasian did;** however, in 3 of those tests, only the African-American tester received a response, possibly a natural outcome of the African-American's role as the first party to inquire.

### 2. Substance of Communication

*Differences in the type of information and terms offered to a prospective tenant can indicate a landlord and/or agent's desire to encourage or discourage certain applicants. This category includes whether the prospective tenant was explicitly offered the opportunity to see the unit, provided with a specific time for viewing, provided with contact information for the landlord and/or agent, asked questions by the landlord and/or agent, or contacted by the landlord and/or agent in subsequent communications.*

**The Latino tester experienced slightly more differential treatment in terms of whether he was told the unit was available. However, the African-American tester experienced slightly more differential treatment in terms of whether he was given an opportunity to see the unit.** In one test, the Latino and/or Caucasian testers were told the unit was available, but the African-American tester was not; compare this, however, with three tests wherein the Latino tester was not told the unit was available while the African-American and/or Caucasian testers were. In three tests, the African-American and/or Caucasian testers were given the opportunity to see the unit, but that opportunity was not extended to the Latino tester. In two tests, the African-American tester was not invited to see the unit while the Latino and/or Caucasian testers were.

**In regard to details about available units, however, the African-American tester experienced the most differential treatment.** For example, in six tests, the landlord gave the Latino and/or Caucasian a specific time to see the unit, but did not provide that same information

to the African-American tester. Similarly, in seven instances, the Latino tester was invited to follow up but the African-American tester was not.<sup>7</sup> The difference was not as stark with some other data points, though. In two tests, the African-American and/or Caucasian testers were given the address, but the Latino tester was not, as compared to one test where the Latino and/or Caucasian testers were given the address but the African-American was not. In three tests, the Latino and/or Caucasian testers were given a phone number, but the African-American was not, as compared to four tests where the African-American and/or Caucasian were given a phone number when the Latino tester was not.

**On the whole, the African-American tester experienced more differential treatment in terms of the substance of communications by a landlord and/or agent.**

### **3. Tone of Communication**

*The manner in which a landlord and/or agent communicates with a prospective tenant, including whether she signs her name, utilizes courtesy language like "please" and "thank you," and uses effusive language like "love to" or "great" is often an important indication of the landlord and/or agent's interest, or lack of interest, in a prospective tenant. A curt response can be an attempt to discourage a person from applying.*

**African-Americans experienced more differential treatment in this category than either of the other groups.** For instance, in 11% of tests, the landlord and/or agent signed his response to the Latino and/or Caucasian testers, but not to the African-American tester. Similarly, in 9% of tests, the landlord and/or agent used courtesy and effusive language in his communications with the Latino and Caucasian testers, but not with the African-American tester. Compare this with the general statistics for differential treatment of the Latino tester: in 6% of tests, the landlord and/or agent signed his response to the African-American and/or Caucasian testers, but not the Latino tester; in 8% of instances, the Latino tester did not receive courtesy language when the African American and/or Caucasian tester did; and, in 6% of tests, the Latino tester did not receive effusive language when the African-American and/or Caucasian testers did.

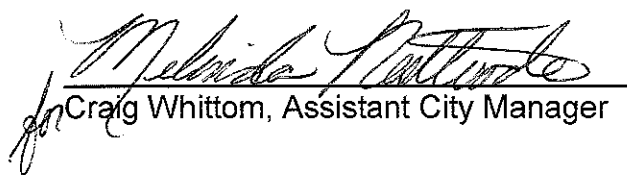
### **4. Conclusions**

Once the results of the audit are publicized or complaints filed, it can be used as a tool to educate housing providers to accept applicants regardless of their race or national origin. FHOM has undertaken this testing project in Marin, Sonoma and Solano counties and can now challenge and educate housing providers who act in a discriminatory manner to online inquiries, the fastest growing method used for housing search. FHOM will meet with other community groups to strategize additional methods to use the audit results effectively to address housing discrimination.

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<sup>7</sup> The offer to follow up was extended to the African-American tester but not the Latino tester in only one instance.

This concludes the City of Vallejo's Analysis of Impediments to Fair Housing Choice. It is the City's goal to promote Fair Housing in all of its housing and service programs.

  
Craig Whittom, Assistant City Manager

4/21/11  
Date

Preparer: Ty K. Robinson, Community Development Analyst II, City of Vallejo  
Tel: (707) 648-4359  
FAX: (707) 648-5249  
[Ty@ci.vallejo.ca.us](mailto:Ty@ci.vallejo.ca.us)